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**ATLANTIC COUNTY OFFICE**

June 1, 2023

United States Judge Karen M. Williams  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Re: Marc A. Stephens v. Gurbir S. Grewal, Attorney General, State  
of New Jersey, Atlantic County Prosecutor's Office, Stockton  
University, Galloway Township, Detective Sergeant Michael  
Matteoli, Robert Blaskiewicz, Jr., All Defendants sued  
individually and in official capacity.  
1:22-cv-01989-KMW-SAK

Dear Judge Williams:

We offer this letter in response and “opposition” to  
Plaintiff’s motion for reconsideration, filed yesterday, in the  
above-referenced matter.

Plaintiff seeks reconsideration of an opinion and order which  
dismissed the claims as to Galloway Township, along with dismissal  
of certain claims against other defendants. From our review of  
Plaintiff’s reconsideration motion, it appears to advance

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June 1, 2023

United States Judge Karen M. Williams

Re: Marc A. Stephens v. Gurbir S. Grewal, Attorney General, State of New Jersey, Atlantic County  
Prosecutor's Office, Stockton University, Galloway Township, et al.  
1:22-cv-01989-KMW-SAKD

arguments for reconsideration which do not relate, in any way, to the grounds for dismissal of the claims against Defendant Galloway Township as set forth in the Court's decision at docket entry no. 22, pages 15 to 17. Therefore, we presume that no opposition is necessary on behalf of Galloway Township, but we nonetheless file this letter to preserve Galloway Township's position that the motion does not support reconsideration of the dismissal of Galloway Township. Plaintiff makes certain argument concerning the Court's Tort Claims Act analysis, which could relate to additional grounds for dismissal of certain claims against Galloway, but the Court's opinion reflects that even if the TCA issue were decided in Plaintiff's favor, the claims against Galloway could not proceed because of the failure to plead a factual basis for Galloway Township liability since no Galloway Township employee is alleged to have caused the harm complained of by Plaintiff Stephens.

Respectfully,

**BARKER, GELFAND, JAMES & SARVAS**  
**A Professional Corporation**

By: s/ Todd J. Gelfand  
Todd J. Gelfand, Esquire

cc: MARC A. STEPHENS  
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